

FILED**Jun 27 - 2024**

John M. Domurad, Clerk

UNITED STATES DISTRICT COURT

Northern District of New York

6th Judicial Division

APRIL CHANDLER

Plaintiff

-against-

MARK SKIPPER AKA SKIP ARCHIMEDES,
MICHAEL MALOY, THOMAS HARRISON,
DAVID GUC ET AL.Defendants

Case No.3:24-CV-206

LETTER TO THE JUDGE

Good morning Your Honor,

I respectfully request reconsideration of your decision to strike the Second Amended Complaint, ECF 94 for two reasons:

1. On the hearing June 18th, 2024 I asked the Court for clarification on the submission of the proposed second amended complaint as I didn't know for certainty if I should submit as is, which I sent to the Court redlined, or if there could be additional changes to improve and clarify text to read better and to clear up language so it's clearer for Defendants and the Court to understand my dispute and actions against Defendants. I asked the Court for advice because I'm not an attorney, nor do I profess to be, I'm simply in Federal Court for one reason only, to hold

Defendants accountable for their bad acts towards me and my film Quest For Youth, then I can hopefully get back to work in my field of expertise never to spend another day in Court again so to speak. I did appreciate your patience taking the time to respond to me with what I needed to do regarding the proposed second amended complaint given I genuinely did not know if I should submit as is or could it be amended prior to submission. You kindly responded that I couldn't add any additional claims, which I understood to mean not to add any additional causes of action, but you didn't say the proposed second amended complaint couldn't be modified. You added that I needed to ensure it was a complete pleading, all is included as it becomes the complaint and supersedes the pleading sought to be amended in all respects. I'm not suggesting your response is word for word, but I'm certain the record will reflect the above communication between myself and the Court. I followed the Court instructions, reviewed all previously filed documents, complaints from the first one I submitted to the Court and ensured everything I had expressed to the Court in responses to motions, complaints was all included within the second amended complaint, but as per your instructions, I didn't add additional causes of actions.

2. Since I filed the Amended Complaint, ECF 14, and proposed Amended Complaint, ECF 69, further information has come to light in regards to specifically Defendants Vanguard, Thomas Harrison, Michael Maloy, Empirical Media and Mark Skipper aka Skip Archimedes, which clearly demonstrates invasion of privacy. Given I was under the impression as noted in point 1 that I was able to amend the Second Amended Complaint, just not add further causes of action, I entwined brief information within the working document even though it might be more advantageous for me to file a motion to supplement pleading pursuant to Fed. R. Civ. P. 15(d), which would then add the privacy torts as separate causes of action, unfortunately creating more work for Defendant's attorney's and why I felt it was fairer all round to submit a Second Amended Complaint I could live with, within the parameters of what I understood you told me at the hearing, allowing Defendant's attorneys to respond to everything in one go in their motions to dismiss, instead of them having to file additional responses to a motion to supplement pleading

I will have no choice, but to submit if my request is denied given the additional information I've since received from third parties, including YouTube.

Thank you for your time.

Executed on June 27, 2024.

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

April Chandler

Plaintiff